

HUCKABY AND ASSOCIATES

Political Financial Consulting

OGC 2121

Mrn 2314

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March 9, 1989

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Mr. Noble:

This letter serves as the response from J. Stanley Huckaby and Huckaby & Associates to the Subpoena and Order contained in the letter from the Federal Election Commission dated February 3, 1989.

With regard to Interrogatory #1, neither J. Stanley Huckaby nor any staff of Huckaby & Associates was ever in possession of all the documentation supplied to the Santini Committee by the National Republican Senatorial Committee (NRSC) relating to the NRSC and contributor checks sent to the Santini Committee from the NRSC.

Staff members from Huckaby & Associates did review the F.E.C. reports of the Santini Committee, through the pre-primary 1986 report, prior to those reports being filed with the F.E.C. However, Huckaby & Associates did not audit the totals reported by the Santini Committee listing the NRSC as conduit or intermediary. Rather, Huckaby & Associates was assured by Santini Committee accounting staff that all deposits of NRSC checks were reported, and that the appropriate memo schedules supplied by the NRSC were also included in the F.E.C. reports at the time we reviewed them.

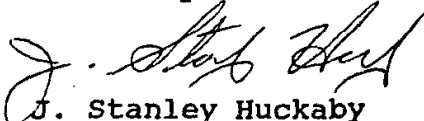
With regard to Interrogatory #2, neither J. Stanley Huckaby nor Huckaby & Associates was consulted concerning either the design, implementation, or management of the NRSC's "Direct-To" program. We were aware of the general existence of the program, as the program was obviously producing income for the Santini Committee. We also realized from the F.E.C. reports that checks were received both from the NRSC and from individual contributors as a result of the "Direct-To" program.

As to the specifics of the "Direct-To" program, however, including internal NRSC solicitation planning and cost determinations, neither J. Stanley Huckaby nor Huckaby & Associates has any knowledge.

With regard to the Request for Documents, neither J. Stanley Huckaby nor Huckaby & Associates is in possession of any correspondence, memoranda, or other documentation concerning the NRSC's conduit or intermediary operations, beyond the content of the F.E.C. reports as filed by the Santini Committee, through the pre-primary 1986 report.

I verify that this response is submitted under oath.

Sincerely:


J. Stanley Huckaby
President
Huckaby & Associates